

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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IN RE:

GENERAL MOTORS LLC  
IGNITION SWITCH LITIGATION

*This Document Relates to:*  
*All Actions*

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)  
) No. 14-MD-2543 (JMF)

) ~~No. 14-MC-2543 (JMF)~~

) Hon. Jesse M. Furman  
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**LEAD COUNSEL’S MOTION FOR ORDER PERMITTING UNDER SEAL AND *IN CAMERA* SUBMISSION OF EXHIBITS TO LEAD COUNSEL’S RESPONSE IN OPPOSITION TO BAILEY COWAN HECKAMAN’S AND THE POTTS FIRM’S MOTIONS FOR DECLARATORY JUDGMENT ON ASSESSMENTS FOR STATE COURT FILED AND UNFILED CASES**

In connection with this Court’s November 15, 2019 Order (Dkt. 7406) requiring Lead Counsel to file “any opposition to both Potts[‘]s motion and BCH[‘]s motion [for Declaratory Judgment],” Lead Counsel respectfully requests an Order permitting Lead Counsel to file portions of, and certain exhibits to, Lead Counsel’s Consolidated Response in Opposition to BCH’s and Potts’ (collectively, “the Firms”) motions for declaratory judgment on assessments for certain of the Firms’ state-court filed and unfiled cases, under seal and *in camera*. Specifically, Lead Counsel respectfully requests permission to: (1) file fully under seal and *in camera* Exhibits B, C, D, E, F, G, H, I, N, O, P, Q, and R to Lead Counsel’s Consolidated Response in Opposition to the Firms’ motions for declaratory judgment on assessments for certain of the Firms’ state-court filed and unfiled cases (hereafter “Lead Counsel’s Opposition”); (2) file in partially redacted form Exhibit J to Lead Counsel’s Opposition; and (3) file in partially redacted form Lead Counsel’s Opposition to protect the attorney opinion work product cited therein. Because the aforementioned exhibits and redactions reflect attorney opinion work product, Lead Counsel respectfully requests that the Court permit Lead Counsel to submit said filings under seal and *in camera* (that is, filing under

seal and submission to the Court by email without disclosure to New GM). Lead Counsel is contemporaneously filing a Memorandum in Support of this Motion.

Dated: November 19, 2019

Respectfully Submitted,

/s/ Robert C. Hilliard

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Application GRANTED temporarily. The Court will assess the propriety of the sealing and redactions when deciding the underlying motions. The Clerk of Court is directed to terminate 14-MD-2543, ECF No. 7437. SO ORDERED.

November 19, 2019